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7 Attorney for Adrian Rodriguez-Brito

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**
10

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 ADRIAN RODRIGUEZ-BRITO,
15 Defendant.
16

Case No. 2:21-MJ-00751-EJY

**STIPULATION TO CONTINUE
PRELIMINARY HEARING**
(Second Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,
18 Acting United States Attorney, and Jared Grimmer, Assistant United States Attorney, counsel
19 for the United States of America, and Rene L. Valladares, Federal Public Defender, and
20 Benjamin F. J. Nemec, Assistant Federal Public Defender, counsel for Adrian Rodriguez-Brito,
21 that the Preliminary Hearing currently scheduled on December 20, 2021 at 4:00 pm, be vacated
22 and continued to a date and time convenient to the Court, but no sooner than ninety (90) days.

23 This Stipulation is entered into for the following reasons:

24 1. The parties have an executed plea agreement under the fast-track
25 program. There is an arraignment and plea in front of the district court judge on February 2,
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2022 pursuant to that fast-track agreement. Thus, an extension is appropriate so both parties may receive the benefit of the bargain under the executed plea agreement.

2. Parties have entered negotiations and need the additional time to resolve this matter.

3. Defendant is not incarcerated and does not object to a continuance.

4. Additionally, denial of this request for continuance could result in a miscarriage of justice.

This is the second request for continuance filed herein.

DATED this 16th day of December, 2021.

RENE L. VALLADARES
Federal Public Defender

CHRISTOPHER CHIOU
Acting United States Attorney

/s/ Benjamin F. J. Nemec
By _____
BENJAMIN F. J. NEMEC
Assistant Federal Public Defender

/s/ Jared Grimmer
By _____
JARED GRIMMER
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,
4 Plaintiff,

5 v.

6 ADRIAN RODRIGUEZ-BRITO,
7 Defendant.
8

Case No. 2:21-MJ-00751-EJY

ORDER

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10 Based on the Stipulation of counsel and good cause appearing,

11 IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on
12 Monday, December 20, 2021 at the hour of 4:00 p.m., be vacated and continued
13 to March 21, 2022 at the hour of 4:00 p.m., in Courtroom 3B.

14 DATED this 16th day of December, 2021.

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16 _____
17 UNITED STATES MAGISTRATE JUDGE
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